

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

Courtney Boyd #208921
Plaintiff
VS.

Dr. Darbouze et al.,
Defendants

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CV-2:06-511-ZUKW

2007 MAY 14 AM 9:59

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DISTRICT ALA

MOTION FOR GOOD CAUSE SHOWN FOR DEPOSITIONS
UPON WRITTEN QUESTIONS Fed. R. Civ. Proc. 31(a)(1)
Comes Now, The Plaintiff, Courtney Boyd, moves into this
Honorable Court pursuant to 31(a)(1) Fed. R. Civ. Proc. The
Plaintiff submit the following in support:

1. The plaintiff request that Depositions upon written Questions be grant, so that the plaintiff may have the Defendants, witness all under oath for the question to be asked at the trial or hearing.
2. The plaintiff request that this Honorable Judge issuing an order for the Clerk of Easterning Court, to provide the plaintiff with the paper and type write, so that he may be able to write his Question. Because he is unable to buy legal paper or ink pen, because he does not have the money to do so with.
3. The plaintiff request that if this Honorable Judge is unable to grant this motion, then he request that a Counsel be given, because he is unable to work on this suit in lock up, with proper legal help. Page 1

4. The plaintiff will request a Deposition of the following people: All (4) Defendants in this case, Kelly Johnson, RN, any witness that the Defendants may call as a witness.

Wherefore, The plaintiff, prays that the Honorable Court will grant this Motion an Order the written Deposition be taken, and that the Order of Restoring Court Fac. allow the plaintiff to use the type-write, and give him the amount of legal fees need to write his Deposition or appoint him a Counsel to help him. *Wesley Butts*

Cert. of Date of Service

I hereby Certify that I have served a copy of the foregoing upon the Defendant Counsel, by placing it into Restoring Court Fac. mail Box on May 7 2007
Wesley Butts

Page 2

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U.S. DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
MOBILE, ALABAMA

NOTICE OF Deposition of Defendants/
Witness

Please take notice that, on the Defendants, pursuant to the Fed. R. Civ. Proc. Plaintiff, Courtney Boyd will take the deposition of Jean Darbouze M.D., Kay Zwisson RN, H.S.A. and Cynthia Zambles RN, Susanne Bush LPN, Kelly JohnsonRD before a notary public or some other officer authorized by law to administer oaths. The Deposition will be taken at Eastling Corr. Fac located at 200 Wallace Dr, Cl.O, AL 36617. You are invited to attend and participate.

The Deposition will be taken as follows:

1. Ms. Cynthia Zambles RN. at 10:00am on ~~June 04~~ June 04, 2007.
2. Ms. Kelly Johnson R.N. at 10:00am on ~~June 05~~ June 05, 2007
3. Ms. Susanne Bush LPN, at 10:00am on June 06, 2007
4. Ms. Kay Zwisson R.N., H.S.A. at 10:00am on June 07, 2007
5. Ms. Jean Darbouze M.D. at 10:00am on June 08, 2007

The deponent is requested to produce the following documents and things, at the time of this other deposition:

Page 1

1. All documents in his or her possession, custody, or control, regarding the issues in this lawsuit.
2. All document regarding the nurse staff of Prison Health Service.
3. All investigation relating to the Claims made by Country Boyz, including but not limited to any recorded statements taken during said internal investigations.

Certificate of Service

I hereby certify that I have served a copy of the foregoing upon the Defendant Counsel, by placing it into Easterning Court Fac. Mail Box on May 7 2007.



Page 2

Cartney Boyd #208921 13-1-11
EASTERLING CORRECTIONAL FACILITY
200 WALLACE DRIVE
CLIO, ALABAMA 36017

MONTGOMERY AL 3611
07 MAY 2007 PM 2 L



United States Middle District
P.O. Box 711
Montgomery, AL 36101

"This correspondence is forwarded from
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